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Bryan D. Glass
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November 14, 2019

Via ECF

Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Roy Wein v. New York City Department of Education*
18 Civ. 11141 (PAE)
Plaintiff's Request for extension of time for joint stipulation of
statement facts

Dear Judge Engelmayer:

I am Plaintiff's counsel in the above-referenced matter. I write to respectfully request an extension of the deadline to submit the joint statement of stipulated facts in this matter. This is the first request for an extension of this date.

At the last October 25, 2019 conference, the Court gave the parties until November 15, 2019, to submit a joint statement of stipulated facts. The Court further directed defense counsel to create the first draft and provide it to Plaintiff's counsel for review, and suggested a cooperative approach between the parties in doing so.

Despite the Court issuing the order on October 25, 2019, defense counsel did not provide Plaintiff's counsel with a draft of her stipulated facts until approximately 2 pm yesterday on November 13, 2019. Due to defense counsel providing a draft so late, Plaintiff requested her consent for an extension until November 25, 2019 to allow Plaintiff time to review the extensive record in the case, consult with Plaintiff, and respond with additional statement of facts to be gleaned from the deposition transcripts and documents in this case. Defense counsel has not consented to this request for an extension of time, and has not provided any specific reason for refusing to consent.

Accordingly, Plaintiff respectfully requests that the Court so order an extension to submit the joint statement of facts until November 25, 2019. Plaintiff does not believe resetting the other summary judgment deadline dates are necessary, but does not object if the Court prefers to reset the other deadline dates as well.

Thank you for Your Honor's consideration.

Respectfully submitted,



Bryan D. Glass, Esq.

cc: Brittany Finder, Assistant
Corporation Counsel,
Attorney for Defendant
(via ECF)

11/15/19

The Court grants an extension until November 20, 2019 for the parties to submit their joint statement of facts. All other summary judgment deadlines remain in place.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge